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10 **UNITED STATES DISTRICT COURT**
11 **NORTHERN DISTRICT OF CALIFORNIA**
12 **SAN FRANCISCO DIVISION**
13

14 PAULA HALE,)	Case No. 3:23-cv-00700-LJC
15 Plaintiff,)	STIPULATION AND ORDER FOR AN
16 vs.)	EXTENSION OF TIME
17)	
18 KILOLO KIJAKAZI,)	
19 Acting Commissioner of Social Security,)	
20 Defendant.)	
21)	

22
23 IT IS HEREBY STIPULATED, by and between the parties through their respective
24 counsel of record, with the Court's approval, that Defendant shall have a 45-day extension of
25 time, from July 31, 2023 to September 14, 2023, for Defendant to respond to Plaintiff's Motion
26 for Summary Judgment (Dkt. No. 13).

27 This is Defendant's first request for an extension of time. Good cause exists for this
28 extension due to Defendant's counsel's workload as described below. Defendant's counsel was

1 recently assigned this case along with several other cases due in the next few weeks, with ten of
2 those due in in a nine-day period. Additionally, Defendant's counsel requires time to review the
3 1,000-page record; evaluate the three main issues and 15 sub-issues raised in Plaintiff's brief;
4 determine whether options exist for settlement; and if not, to prepare Defendant's response to
5 Plaintiff's motion. Defendant's counsel will endeavor to complete these tasks as soon as
6 possible. This request is made in good faith and with no intention to unduly delay the
7 proceedings, and counsel apologizes for any inconvenience.

8
9 Plaintiff does not oppose Defendant's request for an extension of time. The parties
10 further stipulate that the deadline for any reply by Plaintiff, if necessary, will be extended
11 accordingly.

12
13
14 Respectfully submitted,

15 Dated: July 17, 2023

16 /s/ Daniel Homer
17 (*as authorized via email)
18 DANIEL HOMER
Attorney for Plaintiff

19 Dated: July 17, 2023

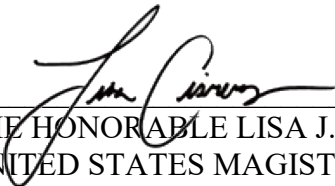
20 ISMAIL J. RAMSEY
United States Attorney

21 /s/ Michelle A. Pavelek
22 MICHELLE A. PAVELEK
23 Special Assistant U.S. Attorney
24 Attorneys for Defendant
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ORDER

Pursuant to stipulation, IT IS SO ORDERED.

Dated: July 17, 2023



THE HONORABLE LISA J. CISNEROS
UNITED STATES MAGISTRATE JUDGE